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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JOHN STOSSEL, an individual,

Plaintiff,

v.

META PLATFORMS, INC., a Delaware
corporation; SCIENCE FEEDBACK, a French
non-profit organization; and CLIMATE
FEEDBACK, a French non-profit organization,

Defendants.

Case Number: 5:21-cv-07385-VKD

**LR 6-2(A) STIPULATION TO EXTEND
DEADLINE FOR DEFENDANTS TO
FILE MOTION FOR ATTORNEYS'
FEES AND COSTS AND [PROPOSED]
ORDER**

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, Plaintiff John Stossel, Defendant Meta Platforms, Inc. (“Meta”), and Defendant Science Feedback¹ (collectively, the “Parties”) respectfully submit this Stipulation to extend the deadline for Defendants Meta and Science Feedback to file their respective motions for attorneys’ fees and costs. This stipulated request is supported by the accompanying declaration of Molly M. Jennings.

WHEREAS, Plaintiff John Stossel filed the Complaint on September 22, 2021 (Dkt. No. 1);

WHEREAS, Meta moved to dismiss the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) and to strike the claims asserted against Meta pursuant to California’s anti-SLAPP statute on November 29, 2021 (Dkt. No. 27, “Meta’s Motion”);

WHEREAS, Science Feedback moved to dismiss the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) and to strike the claims asserted against Meta pursuant to California’s anti-SLAPP statute on January 31, 2022 (Dkt. No. 50, “Science Feedback’s Motion”);

WHEREAS, the Court held a hearing on both Meta’s Motion and Science Feedback’s Motion on April 12, 2022 (Dkt. No. 58);

WHEREAS, on October 11, 2022, the Court granted both Meta’s Motion and Science Feedback’s Motion without leave to amend and required Meta and Science Feedback to file a noticed motion for attorneys’ fees and costs in compliance with Civil Local Rule 54-5 “[i]f defendants seek an award of attorneys’ fees and costs pursuant to the anti-SLAPP statute, Cal. C.C.P. § 425.16(c)(1)” (Dkt. 67);

WHEREAS, the Court entered judgment in favor of Meta and Science Feedback on the same day (Dkt. 68);

WHEREAS, pursuant to Civil Local Rule 54-5, Meta’s and Science Feedback’s respective motion for attorneys’ fees and costs will be due on October 25, 2022, i.e., “within 14 days of entry of judgment by the District Court, unless otherwise ordered by the Court after a stipulation to enlarge time under Civil L.R. 6-2 or a motion under Civil L.R. 6-3”;

¹ Originally sued as “Science Feedback and Climate Feedback.”

1 WHEREAS, the Parties agreed to extend the deadline for Meta and Science Feedback to
2 file their respective motions for attorneys' fees and costs from October 25, 2022 to November 22,
3 2022;

4 WHEREAS, the Parties believe that the moderate extension will allow the Parties sufficient
5 time to conduct meaningful meet-and-confer sessions in compliance with Civil Local Rule 54-
6 5(a);

7 WHEREAS, extending the deadline for Meta and Science Feedback to file their respective
8 motions for attorneys' fees and costs will not affect any other date already set by Court order;

9 **IT IS HEREBY STIPULATED AND AGREED** by the Parties that the deadline for
10 Meta and Science Feedback to file their respective motions for attorneys' fees and costs shall be
11 extended from October 25, 2022 to November 22, 2022.

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Dated: October 14, 2022

DHILLON LAW GROUP INC.

By: /s/ Krista L. Baughman
KRISTA L. BAUGHMAN

Attorneys for Plaintiff John Stossel

Dated: October 14, 2022

WILMER CUTLER PICKERING
HALE AND DORR LLP

By: /s/ Molly M. Jennings
MOLLY M. JENNINGS

Attorneys for Defendant Meta Platforms, Inc.

Dated: October 14, 2022

DAVIS WRIGHT TREMAINE LLP

By: /s/ Thomas R. Burke
THOMAS R. BURKE

*Attorneys for Defendants Science Feedback
and Climate Feedback*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that:

The deadline for Meta and Science Feedback to file their respective motions for attorneys' fees and costs shall be extended from October 25, 2022 to November 22, 2022.

Dated: _____

By: Hon. Virginia K. DeMarchi

ATTORNEY ATTESTATION

I, Molly M. Jennings, am the ECF User whose ID and password are being used to file this Stipulation and accompanying proposed order. In compliance with Civil Local Rule 5-l(h)(3), I hereby attest that concurrence in the filing of this document and all attachments has been obtained from each signatory.

Dated: October 14, 2022

By: /s/ Molly M. Jennings
Molly M. Jennings